

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

COOPER CAMERON CORPORATION,  
Plaintiff,  
v.  
DRIL-QUIP, INC.  
Defendant.

## COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Cooper Cameron Corporation ("Cooper Cameron") alleges against Defendant Dril-Quip, Inc. ("Dril-Quip") as follows:

## JURISDICTION

1. This action arises under the Patent Laws of the United States, 35 U.S.C. §§ 1 et  
seq. This Court has jurisdiction pursuant to 28 U.S.C. §§ 1331 and §1338(a).

## VENUE

2. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391(b) and (c), and 28 U.S.C. § 1400(b) because defendant Dril-Quip, Inc. is incorporated in this judicial district, and is subject to personal jurisdiction here.

## THE PARTIES

3. Plaintiff Cooper Cameron, Inc. is a Delaware corporation. Cooper Cameron, Inc. maintains corporate offices at 1333 West Loop South, Suite 1700, Houston, TX 77027.

4. Cooper Cameron is in the business of providing oil drilling technology products and services for subsea oil extraction and production. Cooper Cameron's technologies have

revolutionized subsea oil production. Specifically, Cooper Cameron's "SpoolTree™" horizontal tree and related technologies have made the structures used for such production safer to use, easier to monitor, and easier and safer to repair when damaged.

5. On information and belief, Dril-Quip, Inc. is a Delaware corporation with corporate offices at 13550 Hempstead Hwy. Houston, TX 77040.

6. Dril-Quip, Inc. has additional operations in countries around the world, including Scotland and Singapore.

### **COUNT I**

#### **(Infringement of U.S. Patent No. 5,145,006)**

7. On September 8, 1992, United States Patent No. 5,145,006 (the '006 Patent), entitled "Tubing Hanger and Running Tool with Preloaded Lockdown," was duly and legally issued by the United States Patent Office (a copy of the '006 patent is attached herewith as Exhibit A). Cooper Cameron is the owner of the '006 Patent.

8. On information and belief, Dril-Quip has been and still is infringing, contributing to the infringement of, and/or inducing the infringement of the '006 Patent by making, selling, using, offering for sale, and/or importing into the United States tubing hanger products that practice the patented invention and will continue to do so unless enjoined by this Court.

9. Cooper Cameron has been damaged by Dril-Quip's infringement, which will continue unless enjoined by this Court.

10. On information and belief, Dril-Quip's infringement of the '006 Patent has been and continues to be willful, entitling Cooper Cameron to enhanced damages.

**COUNT II**

(Infringement of U.S. Patent No. 4,823,871)

11. On April 25, 1989, United States Patent No. 4,823,871 (the '871 Patent), entitled "Hanger and Seal Assembly," was duly and legally issued by the United States Patent Office (a copy of the '871 patent is attached herewith as Exhibit B). Cooper Cameron is the owner of the of the '871 Patent.

12. On information and belief, Dril-Quip has been and still is infringing, contributing to the infringement of, and/or inducing the infringement of the '871 Patent by making, selling, using, offering for sale, and/or importing into the United States tubing hanger products that practice the patented invention and will continue to do so unless enjoined by this Court.

13. Cooper Cameron has been damaged by Dril-Quip's infringement, which will continue unless enjoined by this Court.

14. On information and belief, Dril-Quip's infringement of the '871 Patent has been and continues to be willful, entitling Cooper Cameron to enhanced damages.

**WHEREFORE**, Cooper Cameron prays for judgment and relief as follows:

A. A preliminary and permanent injunction against Dril-Quip's continued infringement, inducing of infringement, and contributing to infringement of the '006 and '871 Patents (collectively the "patents in suit");

B. An award of damages in favor of Cooper Cameron and against Dril-Quip sufficient to compensate Cooper Cameron for Dril-Quip's infringement of the patents in suit, and an assessment of prejudgment interest and post-judgment interest;

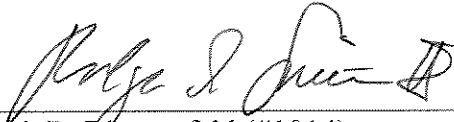
C. A finding by the Court that Dril-Quip's infringement of the patents in suit is willful, and an award of enhanced damages of up to three times the amount found or assessed;

- D. A finding by the Court that this case is exceptional under 35 U.S.C. § 285;
- E. An award to Cooper Cameron of its reasonable expenses, including attorneys' fees, and costs of this action; and
- F. Such other and further relief as the Court finds just and proper.

**DEMAND FOR JURY TRIAL**

Plaintiff Cooper Cameron hereby demands a trial by jury on all issues so triable.

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